

# Exhibit D

## Cole Richter

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**From:** Cole Richter  
**Sent:** Wednesday, May 12, 2021 5:29 PM  
**To:** Jordan Jaffe; amaruska@orrick.com; QE-Sonos3; Joseph LeRoy  
**Cc:** Sonos-WDTX0881-service@orrick.com; Paige Amstutz  
**Subject:** RE: Sonos v. Google (WDTX 20-cv-0881): Sonos's Production SONOS-SVG2-004

Jordan,

These are documents that you argued would be responsive to RFP Nos. 2 and 4-7. For the avoidance of doubt, we don't intend to produce at this time prosecution file histories of "Related Patents" or prior testimony of named inventors or "prosecuting attorneys." Some of the documents we produced evidence conception and reduction to practice. We don't intend to produce anything further at this time, subject to Google securing written permission from the third parties with CBI interests in the ITC materials.

Best,  
Cole

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**From:** Jordan Jaffe <jordanjaffe@quinnemanuel.com>  
**Sent:** Wednesday, May 12, 2021 4:23 PM  
**To:** amaruska@orrick.com; QE-Sonos3 <qe-sonos3@quinnemanuel.com>; Joseph LeRoy <josephleroy@quinnemanuel.com>  
**Cc:** Sonos-WDTX0881-service@orrick.com; Paige Amstutz <pamstutz@scottdoug.com>  
**Subject:** RE: Sonos v. Google (WDTX 20-cv-0881): Sonos's Production SONOS-SVG2-004

Counsel,

We're in receipt of this production of another ~6k pages of documents. A few questions:

- What RFPs are these documents responsive to? We're not asking for document-by-document report, but rather seeking a list of what pending RFPs these documents correspond to. This way we can figure out what disputes remain after our meet and confer this past Friday.
- Does Sonos contend any of these documents evidence conception and reduction to practice for any claimed invention reflected in an asserted claim in this case?
- Finally, given that Sonos produced approximately ~6k pages of documents on Monday and another ~6k pages on Tuesday, are further productions forthcoming? If so when and in what volume?

Given the briefing schedule, we need to know the answers to these questions as soon as possible.

Best regards,

Jordan R. Jaffe // Quinn Emanuel // 415.498.0556 // [jordanjaffe@quinnemanuel.com](mailto:jordanjaffe@quinnemanuel.com)

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**From:** Amy Maruska <[files@orrick.com](mailto:files@orrick.com)>  
**Sent:** Tuesday, May 11, 2021 6:24 PM  
**To:** QE-Sonos3 <[qe-sonos3@quinnemanuel.com](mailto:qe-sonos3@quinnemanuel.com)>; Joseph LeRoy <[josephleroy@quinnemanuel.com](mailto:josephleroy@quinnemanuel.com)>

Cc: [Sonos-WDTX0881-service@orrick.com](mailto:Sonos-WDTX0881-service@orrick.com)

Subject: Sonos v. Google (WDTX 20-cv-0881): Sonos's Production SONOS-SVG2-004

[EXTERNAL EMAIL from [files@orrick.com](mailto:files@orrick.com)]

Counsel,

Sonos hereby produces documents bearing Bates numbers SONOS-SVG2-00026244 - SONOS-SVG2-00032285. The documents have been designated Highly Confidential - Attorneys' Eyes Only and Highly Confidential - Source Code pursuant to the Protective Order. The password for the encrypted container will be sent separately.

Regards,  
Amy Maruska  
Senior Paralegal

## Files attached to this message

Filename	Size	Checksum (SHA256)
SONOS-SVG2-004.zip	901 MB	e46e9b4ce06bed61493a8b667e45aaafc602ab59a8a59b466d38efa245fff1848

Please click on the following link to download the attachments:

<https://files.orrck.com/message/Ta9iDy1qFaAktU3nubbF7C>

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The attachments are available until: **Sunday, 16 May.**

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